IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHAEL MORGAN and LIBERTY RISK CONSULTING, LLC.,

v.

Plaintiffs,

NO. 2:22-cv-1631-LPL

AMY NOSS, KEITH HICKEY, JOYCE MORGAN, BRITTANY PADUGANAN, and ETBP ENTERPRISES, LLC d/b/a THRIVE TALENT MANAGEMENT

Defendants.

Magistrate Judge Lenihan

JOINT MOTION TO SUSPEND DEADLINES

Counsel for all parties in this matter hereby respectfully request that the Court suspend Defendants' deadline to respond to Plaintiffs' Complaint, stating as follows:

- 1. Plaintiffs filed their Complaint in this matter on November 16, 2022. (ECF No. 1.)
- 2. All Defendants sought and were granted an extension to respond to the Complaint to January 24, 2023. (ECF No. 23.)
 - 3. All Defendants advised Plaintiffs of their intent to file motions under Rule 12.
- The Parties met and conferred, and all Defendants have consented in writing to 4. Plaintiffs filing an amended complaint to try to address Defendants' concerns.
- 5. Plaintiffs are unable to file an amended complaint before Defendants' current January 24th deadline.
 - 6. Plaintiffs proposed a deadline of February 3, 2023 to file their amended complaint

and Defendants consented, provided their existing deadlines be suspended.

WHEREFORE, the Parties jointly request that the Court enter an Order suspending Defendants' January 24, 2023 deadline to respond to the Complaint in light of Plaintiffs' forthcoming Amended Complaint.

Respectfully submitted on January 23, 2023 by:

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/s/ Erica G. Wilson

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